

College of Agriculture and Life Sciences

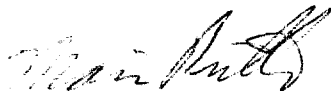
Department of Fruit and
Vegetable Science
134-A Plant Science Bldg.
Ithaca, NY 14853-4203

Telephone: 607 255-4568
Facsimile: 607 255-0599
Telex: 6713054 cornelluw

6823 '97 DEC 16 A11:58

TO: Dockets Management Branch (HFA-305)
Food and Drug Administration
12420 Park Lawn Dr., Rm. I-23
Rockville, MD 20857

FROM: Marvin Pritts, Professor



RE: Microbial Safety of Fresh Produce

DATE: December 9, 1997

The following are comments on the guidelines proposed for microbial safety of fresh produce.

Overall, the guidelines are reasonable and will encourage the produce industry to reevaluate practices from a different perspective than in the past

Caution must be used to prevent these basic guidelines from becoming codified into specific rules. Additional regulations almost always disproportionately affect smaller growers. Many well-intentioned government regulations and policies have benefited large farms, especially in the West, at the expense of smaller farms. The effect of new guidelines on small farms should be foremost in the minds of regulators.

Because of the dominance of California in fresh fruit and vegetable production, there will be the tendency to develop guidelines specific for their situation - and these may not apply in other regions - particularly if crop-specific recommendations are proposed. An example might be strawberries which are grown very differently in California and Florida than elsewhere in the country.

Guidelines must not discourage the use of manure. Manure disposal is a major environmental problem facing agriculture. Cropland is the most logical disposal site for manure as it improves soil health and reduces the requirement for manufactured fertilizer.

Guidelines must not increase the need for plastic and styrofoam use in packaging because this contributes to environmental problems. **Caution must be used to prevent a well-intentioned guideline from creating larger problems elsewhere.**

Coordination with other existing regulations is essential. It is very difficult for producers to keep track of the plethora of rules, regulations and guidelines governing their production practices.

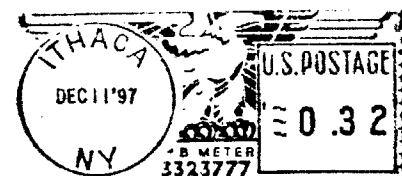
There is a critical need for research to support the guidelines. Although some of the guidelines seem logical, there is little data to support them. We need to know, for example, how long pathogens in manure are viable in field soils and under what conditions. We need to have quick, accurate, and inexpensive sampling techniques for testing irrigation water. We need to know how to treat water that may contain pathogens in order to prevent contamination.

97N-0451

C 13

CORNELL
UNIVERSITY

College of Agriculture and Life Sciences
Department of Fruit and Vegetable Science
134-A Plant Science Building
Ithaca, NY 14853-4203



Dockets Management Branch (#FA-305)
Food + Drug Administration
12420 Park Lawn Dr., Rm 1-23
Rockville, MD 20857

